



U.S. Department of Justice

*United States Attorney
Northern District of Ohio*

United States Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113-1852

April 15, 2016

David Klucas, Esq.
1900 Monroe Street
Toledo, OH 43624

Re: United States v. Aroldo Castillo-Serrano, et al., Case No. 3:15CR24

Dear Mr. Klucas:

We are writing as a follow up to the court proceedings earlier this week and our telephone conversation yesterday.

First, during the court hearing last Monday, Judge Carr ordered your client to return all of the deeds/conveyances in his possession or control, both actual and constructive, that he and his associates obtained as part of the human trafficking/smuggling conspiracy. Because Judge Carr stated that these deeds must be returned "to the Government's satisfaction," we wanted to be clear that the following is required to satisfy the terms of that order:

1. **All** land deeds and conveyances obtained as part of your client's human trafficking and smuggling crimes, including, but not limited to, deeds/conveyances held by his mother, wife, nephew, and in-laws, shall be signed back over to their original owner and sent to F.B.I. Special Agent Matthew Komar at the following address:

S.A. Matthew Komar
Federal Bureau of Investigation
58 West Third Street, Suite A
Mansfield, OH 44902

2. All of the deeds/conveyances shall be returned to the Federal Bureau of Investigation at the above address no later than **June 13, 2016** (two weeks before the sentencing hearing). We are setting this deadline so that we will have sufficient time before the sentencing hearing to contact the victims and ensure that we have, in fact, received all of the deeds.

In the hopes of expediting the complete and timely return of the criminally obtained deeds/conveyances we are including a partially-redacted copy of the cover page of one of the deeds that your client obtained during the course of his human trafficking crimes. We did not

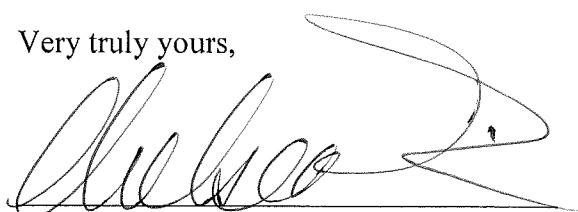
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redact the name of the lawyer/notary that your client used, in case you wish to contact him or her to aid you in your process.

Finally, you informed us that you anticipate filing an ex parte motion with the Court requesting funds to obtain and return the deeds. As we discussed, the United States has no objection to this ex parte written request, but we do oppose any ex parte verbal discussions with the Court regarding this matter.

Please feel free to contact us with any questions or concerns.

Very truly yours,



Chelsea S. Rice (216-622-3752)
Assistant U.S. Attorney

Dana Mulhauser (202-305-0007)
Trial Attorney

Attachment (1)

cc: S.A. Matthew Komar (via email)

LICENCIADO
Leopoldo de Jesús Noriega Avila
ABOGADO Y NOTARIO

TESTIMONIO
DE LA ESCRITURA PUBLICA

No. _____

OBJETO

CONTRATO DE CONTRAVENIA DE NTRA. ENRIQUEZ EN 2000

OTORGANTE

A FAVOR DE

DE _____ DE 20_____

5a. Calle 7-118, Zona 1.
Interior Enriquez Plaza
Huehuetenango.
Tel. 7934-5278 * Cel. 5033-6299

Barillas, Huehuetenango.
Frente al Edificio Municipal
Tel. 7780-2136